

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

|                 |   |                        |
|-----------------|---|------------------------|
| In re:          | ) | Chapter 11             |
|                 | ) |                        |
| E. Thomas Wold, | ) | Case No. 08-27668      |
|                 | ) | Judge Eugene R. Wedoff |
| Debtor.         | ) |                        |

**NOTICE OF MOTION**

TO: ATTACHED SERVICE LIST:

PLEASE TAKE NOTICE that on the 23<sup>rd</sup> day of March, 2010, at 9:30 a.m. or as soon thereafter as counsel can be heard, I shall appear before the Honorable Eugene R. Wedoff, Bankruptcy Judge, in the room usually occupied by him as courtroom 744 in the United States Bankruptcy Court in the Everett McKinley Dirksen Federal Building, 219 South Dearborn Street, Chicago, Illinois, or before any other Judge who may be sitting in his place and stead and shall present the **MOTION OF DEBTOR FOR AUTHORITY TO PAY ACCOUNTANT FINAL COMPENSATION**, a copy of which is attached hereto and herewith served upon you, and shall pray for the entry of an Order in compliance therewith.

AT WHICH TIME and place you may appear if you so see fit.

/s/Eugene Crane  
Crane, Heyman, Simon, Welch & Clar  
135 S. LaSalle St., Suite 3705  
Chicago, Illinois 60603  
(312) 641-6777

**CERTIFICATE OF SERVICE**

The undersigned, being first duly sworn on oath deposes and states that he caused a copy of the foregoing Notice and attached **MOTION OF DEBTOR FOR AUTHORITY TO PAY ACCOUNTANT FINAL COMPENSATION** to be served by First Class U.S. mail, postage prepaid, to the names and addresses listed on the attached Service List on the 1<sup>st</sup> day of March, 2010, before the hour of 5:00 p.m.

/s/Eugene Crane

**SERVICE LIST**

Stephen G. Wolfe  
United States Trustee  
219 S. Dearborn, #873  
Chicago, IL 60604

Lois West  
Popowcer Katten, Ltd.  
35 E. Wacker Drive  
Suite 1550  
Chicago, IL 60601

E. Thomas Wold  
3750 N. Lakeshore Dr., Apt. 6-B  
Chicago, IL 60613

Allan S. Farnell  
10 South LaSalle St.  
Suite 3300  
Chicago, IL 60606

Barry A. Chatz  
Arnstein & Lehr LLP  
120 S. Riverside Plz, Ste. 1200  
Chicago, IL 60606-3910

MB Financial Bank, N.A.  
c/o L. Judson Todhunter  
Howard and Howard  
200 S. Michigan Ave., Suite 1100  
Chicago, IL 60604

Terrence D, McCabe  
Ryan and Ryan  
33 N. Dearborn St., Suite 1530  
Chicago, IL 60602

Polar Container Corporation  
7123 Barry Ave.  
Rosemont, IL 60018

Miriam R. Stein  
Arnstein & Lehr LLP  
120 S. Riverside Plz, Suite 1200  
Chicago, IL 60606-3910

Stanley D. Schwartz  
10 South LaSalle Street  
Suite 3300  
Chicago, IL 60606

Matthew A. Swanson  
George R. Mesires  
Barack Ferrazzano Kirschbaum &  
Nagelberg LLP  
220 W. Madison St., Suite 3900  
Chicago, IL 60606

Ronald Barliant  
Zachary Garrett  
Goldberg Kohn Bell Black Rosenbloom &  
Moritz Ltd.  
55 E. Monroe, Suite 3300  
Chicago, IL 60603-5792

Terri M. Long  
Law Office of Terri M. Long  
18201 Morris Ave.  
Homewood, IL 60430

Fitraco, N.V.  
c/o Goldberg Kohn  
Attn: Steven A. Levy  
55 E. Monroe St., Suite 3300  
Chicago, IL 60603

30 East Huron Condo Association  
30 East Huron  
Chicago, IL 60611

Best Drake Die Inc.  
13434-365 Kolmar  
Crestwood, IL 60445

Chicago Department of Revenue  
121 North LaSalle Street  
Room 107  
Chicago, IL 60602

Cook County Department of Revenue  
Amusement Taxes  
121 North LaSalle St.  
Chicago, IL 60664-1670

Countrywide Home Loans  
PO Box 650070  
Dallas, TX 75265

Delta Press  
9400 Robinson Road  
Franklin Park, IL 60131

Department of the Treasury  
Internal Revenue Service  
Centralized Insolvency Operations  
PO Box 21126  
Philadelphia, PA 19114

Horizon International LLC  
7127 Barry Ave.  
Rosemont, IL 60018

Illinois Department of Revenue  
Bankruptcy Section  
PO Box 64338  
Chicago, IL 60664-0338

JP Morgan Chase  
7255 Baymeadows Way  
Mail Stop JAXB2007  
Jacksonville, Florida 32256

Keane & Keane  
225 W. Washington, Suite 1701  
Chicago, IL 60606

Laurel Manufacturing LLC  
2483 Pratt Blvd.  
Elk Grove Village, IL 60007

Lemal Kulunkoblu  
d/b/a Caytv  
7127 Barry Ave., Unit 2B  
Rosemont, IL 60018

Levin & Rosen  
4051 Old Orchard Road  
Skokie, IL 60076

MB Financial Bank  
PO Box 6261  
Chicago, IL 60680-6261

Metropolitan Pier  
and Exposition Authority  
301 E. Cermak Road  
Chicago, IL 60616

Murray S. Peretz  
414 N. Orleans, Suite 610  
Chicago, IL 60610

National Roofing Corp.  
1237 Circle Ave.  
Forest Park, IL 60130

Perfect Storage Solutions  
9400 Robinson Road  
Franklin Park, IL 60131

Perl Mortgage, Inc.  
c/o Countrywide Home Loans Serv.  
2270 Lakeside Blvd.- Mail Stop: RLS-4  
Richardson, TX 75082

Regency Decorating Services  
9400 Robinson Road  
Franklin Park, IL 60131

Richard Parton  
30 E. Huron  
Apts. 5102 & 5104  
Chicago, IL 60611

Superior Fence Co. Inc.  
9401 Schiller Ave.  
Franklin Park, IL 60131

The Patterson Law Firm  
1 North LaSalle Street, Suite 2100  
Chicago, IL 60602

Union National Bank  
101 E. Chicago St.  
Elgin, IL 60120

Venture Fund LLC  
1668 Checker Road  
Long Grove, IL 60047

Washington Mutual  
PO Box 9001123  
Louisville, KY 40290-1123

Webster Bank  
First Federal Bank  
Waterbury, CT 06720

Webster Bank  
PO Box 1809  
Hartford, CT 06144-1809

Illinois Department of Revenue  
Thompson Center, Concourse Level  
100 West Randolph Street  
Chicago, IL 60601-3274

Michael J. Kalkowski  
Fisher and Shapiro LLC  
4201 Lake Cook Road  
Northbrook, IL 60062

Cook County Treasurer  
118 N. Clark  
Suite 112  
Chicago, IL 60602

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FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

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| In re:          | ) | Chapter 11             |
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|                 | ) | Judge Eugene R. Wedoff |
| Debtor.         | ) |                        |

**MOTION OF DEBTOR FOR AUTHORITY  
TO PAY FINAL COMPENSATION TO ACCOUNTANT**

TO THE HONORABLE EUGENE R. WEDOFF, Bankruptcy Judge:

Now comes the Debtor, E. Thomas Wold, by his attorneys, Eugene Crane and the firm of Crane, Heyman, Simon, Welch & Clar, and in support of his Motion for Authority to Pay Final Compensation to Accountant, states as follows:

1. On October 15, 2008 this Court entered an Order for Relief in the above-captioned matter pursuant to a Voluntary Petition under Chapter 11 of the United States Bankruptcy Code, whereby E. Thomas Wold (the "Debtor") was deemed a Debtor-in-Possession as defined in Section 1101 of the Bankruptcy Code.
2. On February 24, 2010 this Court entered an order confirming the Third Amended Plan of Reorganization filed by the Debtor.
3. On May 5, 2009, this Court entered an order authorizing the Debtor to employ Lois West and the accounting firm of Popowcer Katten, Ltd. ("PK"), and to pay a retainer to PK in the amount of \$5,000.00. PK has performed accounting services for the Debtor from April 21, 2009 to December 21, 2009 as described in the invoice attached hereto as Exhibit "A."

4. By this Motion the Debtor requests that this Court allow PK final compensation in the amount of \$8,234.50, as reflected in said invoice, pursuant to Section 330 of the Bankruptcy Code, and to authorize the Debtor to pay said sum, less the retainer, from an escrow account, established by order of this Court, at The Private Bank, which contains funds totaling approximately \$63,000.00, representing remaining proceeds of the sale of certain real estate owned by the Debtor, which proceeds are now free and clear of liens, claims and encumbrances, due to a settlement approved by this Court, between the Debtor and MB Financial Bank N.A.

5. The Debtor believes such fees to be fair and reasonable and that the services provided by PK were of high quality and necessary for the Debtor to successfully proceed through the bankruptcy process and confirm a plan of reorganization.

WHEREFORE, for the foregoing reasons, the Debtor, E. Thomas Wold, by his attorneys, Eugene Crane and the firm of Crane, Heyman, Simon, Welch & Clar, prays for the entry of an Order:

- A. Allowing final compensation to PK, pursuant to Section 330 of the Bankruptcy Code, in the amount of \$8,234.50; and
- B. Authorizing the Debtor to pay said sum to PK, less the \$5,000.00 retainer, from the account at The Private Bank; and

C. Granting such other relief as this Court deems appropriate.

E . Thomas Wold, Debtor

BY: /s/Eugene Crane  
One of his attorneys

Eugene Crane, Esq.  
(Att. Reg. #0537039)  
Crane, Heyman, Simon, Welch & Clar  
Attorneys for the Debtor  
135 South LaSalle Street, Suite 3705  
Chicago, Illinois 60603  
(312) 641-6777  
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